

UNITED STATES DISTRICT COURT
THIRD DIVISION
DISTRICT OF MINNESOTA

Daniel Ludwig,

Court File No. _____

Plaintiff,

v.

NOTICE FOR REMOVAL

Don Hummer Trucking Corporation and
Joseph William Welch,

Defendant.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA:

Petitioner\Defendant respectfully shows and alleges the following in support of its
Petition for Removal.

1. Petitioner is the Defendant in an action commenced against it in Hennepin
County District Court entitled Daniel Ludwig v. Don Hummer Trucking Corporation and
Joseph William Welch. A true and correct copy of the Summons and Complaint served
upon petitioner is attached as **Exhibit "A"**. No further proceedings have taken place in
the state action.

2. Plaintiff, Daniel Ludwig, is and was at all relevant times a citizen who resides
in the City of Dundas and in the State of Minnesota.

3. Petitioner\Defendant Don Hummer Trucking Corporation is and at all relevant
times a citizen and incorporated in the State of Iowa with its principal place of residence
in the State of Iowa.

4. Petitioner\Defendant Joseph William Welch is and was at all relevant times a
citizen who resides in the State of Iowa.

5. Complete diversity exists among the parties to this action and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

6. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332, and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

7. The Summons and Complaint in the state action was served on Defendant on or about July 21, 2020, and Petitioner\Defendant has filed this Notice to Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioner\Defendant prays that the state action pending against them be removed to this Court.

Dated: August 19, 2020.

Lind, Jensen, Sullivan & Peterson
A Professional Association

s/Brian A. Wood

By _____

Brian A. Wood #141690

Attorneys for Defendant

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